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Committee of Tort Claimants*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case)
(Jointly Administered)

**OFFICIAL COMMITTEE OF TORT
CLAIMANTS' NOTICE OF
WITHDRAWAL AS A PLAN
PROPONENT OF JOINT CHAPTER 11
PLAN OF REORGANIZATION OF
OFFICIAL COMMITTEE OF TORT
CLAIMANTS AND AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS (Dkt. No. 4257)**

1 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **COURT JUDGE, THE DEBTORS, AND PARTIES IN INTEREST:**

3 **PLEASE TAKE NOTICE** that all capitalized terms used but not defined herein shall have
4 the meanings ascribed to them in the *Debtors' Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a)*
5 *and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I) Authorizing the Debtors and TCC*
6 *to Enter Into Restructuring Support Agreement with the TCC, Consenting Fire Claimant*
7 *Professionals, and Shareholder Proponents, and (II) Granting Related Relief* (Dkt. No. 5038) (the
8 **"Tort Claimants RSA Motion"**).

9 **PLEASE TAKE NOTICE** that pursuant to Section 2(b) of the Tort Claimants RSA, as
10 amended by that certain First Amendment to Restructuring Support Agreement dated December
11 16, 2019 (Dkt. No. 5143) (the **"Tort Claimants RSA Amendment"**), the Official Committee of
12 Tort Claimants hereby withdraws as a plan proponent of the *Joint Chapter 11 Plan of*
13 *Reorganization of Official Committee of Tort Claimants and Ad Hoc Committee of Senior*
14 *Unsecured Noteholders* (Dkt. No. 4257).

15 **PLEASE TAKE FURTHER NOTICE** that copies of the Tort Claimants RSA Motion, the
16 Tort Claimants RSA, and Tort Claimants RSA Amendment can be viewed and/or obtained: (i) by
17 accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the
18 Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii)
19 from the Debtors' notice and claims agent, Prime Clerk LLC, at
20 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4127 (toll free) for U.S.-based
21 parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com.
22 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

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24 Dated: December 19, 2019

BAKER & HOSTETLER LLP

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26 By: /s/ Cecily A. Dumas

Cecily A. Dumas

27 Counsel to the Official Committee of Tort Claimants
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